

Commissioners Court

Jon Lindsay
County Judge

El Franco Lee
Commissioner
Precinct 1

Jim Fonteno
Commissioner
Precinct 2

Steve Radack
Commissioner
Precinct 3

Jerry Eversole
Commissioner
Precinct 4

Wesley E. Freise, P.E.
Exec. Director

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Harris County Toll Road Authority FCC MAIL ROOM

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June 29, 1993

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
Washington, D.C. 20554

RE: RM No. 8013

Dear Ms. Searcy:

I am writing on behalf of the Harris County Toll Road Authority (HCTRA) in reference to the Notice of Proposed Rulemaking ("NPRM"), released by the FCC in April 1993, proposing changes to the rules pertaining to automatic vehicle monitoring (AVM) systems.

It is my understanding that the Commission proposes to grant exclusive use of 16 MHz of frequencies within the 902-928 MHz band to PacTel/Teletrac operating as a joint venture. HCTRA opposes this petition because it would limit the use of the current AVI system presently installed and operating within the Toll Facility. The full use of the band will be needed for planned extension of the AVI system during the next three to four years.

The HCTRA currently employs AMTECH's AVI technology in 69 of the existing 135 lanes. Operational since October, 1992, the HCTRA currently has issued over 15,000 tags and processes over 17,000 daily transactions through the AVI system. This accounts for over 5 percent of total transactions for the system and is increasing monthly.

Our current expansion plans call for the construction of and implementation of AVI tags in an additional five (5) plazas with the objective of increasing the usage up to seventy (70) percent of total transactions. This would represent usage of approximately 1,500,000 transactions per week processed through the AVI system. Additionally, HCTRA plans to design and build the EZTAG lanes to allow for usage by patrons at 55 MPH therefore considerably reducing the vehicular emissions caused by stop and go traffic through conventional toll facilities.

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The EZTag system provides the following benefits to Harris County and our patrons:

Patrons can pay tolls in a hands-free, non-stop environment.

The system offers additional plaza capacity without costly construction.

Patrons receive reduced fuel consumption because they do not have to stop in order to pay their tolls.

There is less congestion at the plazas.

The environment benefits due to reduced vehicular emissions, and

Harris County benefits by increased productivity because fewer collectors are required to accept payments and make change.

~~my count of analysis was 6.1 per cent of the total~~